



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

March 21, 2022

By ECF and Email

The Honorable John P. Cronan
United States District Judge
Southern District of New York
500 Pearl Street, Room 1320
New York, NY 10007

Re: *No More Deaths v. U.S. Customs and Border Protection*, No. 21 Civ. 954 (JPC)

Dear Judge Cronan:

This Office represents Defendant United States Customs and Border Protection (“CBP”) in the above-referenced Freedom of Information Act (“FOIA”) action. I write on behalf of all parties to update the Court on the status of this FOIA case pursuant to the Court’s February 22, 2022 Order (Dkt. No. 32).

Per the parties’ agreement, CBP has processed approximately 1,800 pages of responsive materials, making its final production of the previously agreed upon materials on October 5, 2021. Plaintiffs are evaluating this production for any potential challenges.

The parties are continuing to discuss appropriate search terms for electronic communications requested by Plaintiffs.

The parties do not believe that there is any need for discovery or an initial conference at this time. The Government proposes that the parties update the Court on the status of collection and production no later than April 20, 2022, to which Plaintiffs consent.

The parties thank the Court for its consideration of this request

Respectfully,

DAMIAN WILLIAMS
United States Attorney for the
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